



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 23 2018

UNITED PARCEL SERVICES

Mr. Jay Cornelius
Environmental Manager
ABC Coke
900 Huntsville Avenue
Birmingham, Alabama 35217

Dear Mr. Cornelius:

Enclosed is a copy of the final report generated by the U.S. Environmental Protection Agency's Region 4 North Air Enforcement & Toxics Section for the inspection conducted at the ABC Coke facility on August 14 - 17, 2018.

Should you have questions regarding the inspection report, contact me at (404) 562-9177, or by email at rieck.stephen@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Rieck".

Stephen Rieck
Environmental Scientist
North Air Enforcement & Toxics Section

cc: Corey Masuca, Principal Air Pollution Control Engineer
Jefferson County Department of Health

United States Environmental Protection (EPA) Agency Region 4

Air Enforcement and Toxics Branch

Inspection Report

I. GENERAL INFORMATION

Facility Name: ABC Coke

Location (Address): 900 Huntsville Avenue
Birmingham, Alabama 35217

Inspection Date: August 14-17, 2018

Type of Inspection (Full or Partial Compliance Evaluation): PCE

ICIS-Air Number: 0107300001

EPA Investigator(s)/Inspector(s): Steve Rieck, Environmental Scientist
Nikki Radford, Environmental Scientist

State/Local Investigator(s)/Inspector(s): Jason Howanitz, JCDH
Kay Parker, JCDH

Person(s) Contacted at Facility (Name and Title): Jay Cornelius, Env. Manager
Bill Osborn, Env. Coordinator
Taylor Owen, Asst. Env.
Coordinator
Olaf Rowland, Safety Supervisor
Sam Robinson, By- Products
Supervisor
Charles Carmichael, By-Products
Manager

Report Prepared by: Steve Rieck

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Metallurgical Coke Manufacturing and Chemical By-Products Facility
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Title V permit #4-07-0001-03
3. Air permit issuance date.	August 11, 2014
4. Air permit expiration date.	August 10, 2019
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	HAPs
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	(For areas included in PCE) 40 C.F.R. Part 61 Subpart L 40 C.F.R. Part 61 Subpart V 40 C.F.R. Part 61 Subpart FF
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Equipment subject to leak detection (Valves, pumps, connectors, flanges)
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Flare and water treatment

B. Process Description (provide narrative or attach description provided by the company or excerpts from the permit)

Coke Batteries:

Coal is transported to the facility by railcar or truck and then loaded into silos. The coal is blended and then conveyed by belts onto the top of the battery where it is then placed in the charge car. After an oven is pushed the charge car distributes the coal into the oven, where it is coked. When the coke is finished coking it is pushed into a quench car. A cantilever hood is placed over the quench car for approximately 1 to 1.5 minutes in order to collect pushing emissions. The quench car is then transported to the quench tower. The quench tower sprays water onto the hot coke, cooling it. The finished coke product is then screened for the different sizes of product. After the coke is screened it is loaded into trucks or rail car and distributed to ABC Coke's customers.

Chemical By-Products plant:

During coking, Coke Oven Gas (COG) is produced by each oven. This gas is used to heat the battery, sent to the boilers, or sent to the flare. As coking occurs raw coke oven gas exits the ovens at a temperature of approximately 1400 – 1600F. It is routed to the Primary Coolers and sprayed with flushing liquor to cool it to 37 C. The COG is sent to the Exhauster where the gas is cooled and cleaned. Tar precipitators are run in parallel to remove acid mist. In the ammonia absorber the gas stream is sprayed with H₂SO₄. This process creates ammonium sulfate in the form of crystallized powder, which is later stored and sold as fertilizer. In the Tar Bottom Final Cooler the COG travels through tar, which removes the naphthalene from the COG. After the Final Cooler, the COG is sent to the wash oil scrubber, where the light oil is removed. The light oil is further processed by removing water. The light oil is sold and removed by truck from the facility. Finally, the clean COG is distributed to be used in the batteries, boilers, or directly to the flare. Twenty-five percent of the gas is used for battery underfire, approximately half is used for boiler cogeneration, and the rest is sent to the flare.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comment
Opening Meeting	Yes	
1. Date and time entered the facility.		August 14, 2018, at 9:00 AM
2. Credentials presented to facility personnel (include name and title).	Yes	All inspectors presented their credentials.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Yes	EPA inspectors held an opening conference in which they explained that they were conducting a Clean Air Act inspection at the Chemical By-Products plant focused on compliance with Part 61, Subparts L, V, and FF, as well as observe facility changes since the last inspection in 2014.
4. Discussed safety issues.	Yes	Inspectors discussed facility-specific safety and emergency procedures.
5. Discussed which records to be reviewed.	Yes	Inspectors requested to review records. See attachment A for a records list.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Yes	Inspectors discussed plans for a walk-through of the Chemical By-Products plant, including process units, tanks, and LDAR equipment.
7. Discussed facility policy regarding photographs or video (if applicable).	Yes	Inspectors indicated that videos may be taken with the OGI camera and that copies of the video would be sent to the company.

8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	Yes	Inspectors discussed use of Toxic Vapor Analyzers (TVAs) on site.
9. Discussed CBI.	Yes	Inspectors discussed that any documents claimed to be CBI would be treated in accordance with all statutes and regulations.
Records Reviewed at the Facility		
10. The types of records reviewed and the time period reviewed.	Yes	Inspectors provided ABC Coke personnel with a list of documents received during the inspection. See attachment A
Facility Walk-Through Observations		
<p>11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr).</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	Yes	<p>Inspectors observed the Chemical By-Products plant and associated process equipment.</p> <p>These process units are subject to LDAR requirements under Subparts L & V, and BWON requirements under Subpart FF.</p> <p>Inspectors used a TVA and an OGI Camera to look for the presence of leaks. Leaks found during inspection are discussed below.</p>
<p>12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	Yes	<p>For LDAR compliance, the facility uses a third party with automated recording of LDAR measurements. The inspection team looked at 2 years of data in the LDAR database.</p> <p>During this review, one LDAR technician had higher than expected background concentrations. However, this appears to be isolated, and no other issues were noted with the data.</p>

13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
<p>14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.).</p> <p>(For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	N/A	
<p>15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	N/A	

16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	Yes	Review of process flow charts revealed a valve that allows material in the excess liquor tank to be routed directly to the thickener tank, which is open to the atmosphere. Facility staff say this only occurs in high rain events when input into the ammonia still can reach capacity limits.
20. Were any visible emissions observed? (if yes, identify the location and equipment).	No	
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	No	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	

23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	No	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	Yes	A video log is provided in Attachment B. A copy of the videos has been provided to ABC Coke.
<p>26. Was the TVA used? If so, identify the equipment monitored and the results.</p> <p>Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release.</p> <p>An attachment may be used for a large amount of information.</p>	Yes	<p>A TVA was used in all areas of the facility.</p> <p>A leak was found at the Dirty Water sump (1,000 ppm), which was repaired during our inspection.</p> <p>A leak was noted on the New Naphthalene sump, which was repaired during our inspection.</p> <p>A sporadic leak (spiking to 10,000 ppm) was found on the pressure relief device (PRD) on the west light oil tank.</p> <p>A sporadic leak (spiking to 30,000 ppm) was noted on the emergency PRD on the excess liquor tank.</p> <p>The facility sends their PRDs for regular service, including seal replacement.</p> <p>After field work, the TVA was bump-checked to ensure data accuracy. No measurements exceeded 10% from their calibration measurements as required by EPA Method 21.</p>

27. Was the PID used? If so, identify how the PID was used and the results. An attachment may be used for a large amount of information.	No	
Closing Meeting		
28. Conducted a closing meeting.	Yes	The inspection team conducted a close out meeting at 10:40 am on August 17.
29. Summarize any additional information needed, if applicable?		
30. Accept a declaration of CBI, if applicable?	No	The inspection team identified CBI material but did not take any CBI material into possession.
31. Discussed observations.	Yes	The team reviewed all actions during the inspection, including LDAR leaks and the bypass valve on the excess liquor tank.
32. Discussed next steps, if applicable?	Yes	
33. Date and time inspection concluded.		The inspection team left the facility around 11:30 am.
Miscellaneous		
34. Include any additional observations, if applicable.		

EPA Investigator/Inspector Signature:



Date Report Finalized:

10/23/18

ATTACHMENT A - ABC Coke document list

1. Subpart FF TAB Calculations
2. LDAR inspection frequency
3. Subpart L equipment list
4. Subpart V equipment list
5. Leaking equipment reports
6. Delay of Repair equipment
7. Calibration gas certification
8. Method 21 calibration reports
9. AVO inspection report
10. Monitored inspection report
11. Enhanced LDAR procedure
12. Drawings for vent capture system on dirty water sump drain collection sump, and Wilputte decanter
13. Facility P&IDs
14. Process flow diagrams

Attachment B - Media log

File Name	Location
MOV_0580	Top of dirty water sump
MOV_0581	Drain collector sump
MOV_0582	No subject
MOV_0583	Emergency vent, Tag #293
MOV_0584	Thickener tank
MOV_0585	No subject
DC_0586	Top of new naph sump
DC_0587	New stainless steel frame for sump
DC_0588	New naph sump
DC_0589	BTX overflow
DC_0590	Dirty water sump
DC_0591	East tar decanter buggy
DC_0592	Tar crumb from east decanter
DC_593	West tar decanter buggy
DC_0594	Tar crumb from west decanter
DC_0595	Corrupted File
DC_0596	Corrupted File
DC_0597	Valve 448 to thickener
DC_0598	Valve to dirty liquor
DC_0599	Line off west dirty liquor
IMG-0859	Dirty water sump
IMG-0860	Above
IMG-0861	Battery and push car
IMG-0862	Battery
IMG-0863	Crumb Buggy

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61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 21 2014

UNITED STATES POSTAL SERVICE

Mr. Mark Poling
Manager of Engineering and Environmental Compliance
ABC Coke
Post Office Box 10246
Birmingham, Alabama 35202

Dear Mr. Poling:

Enclosed is a copy of the final inspection report generated by the U.S. Environmental Protection Agency, Region 4's North Air Enforcement Section for the inspection conducted at the ABC Coke By-Products facility located in Tarrant, Alabama, On May 21, 2014. Region 4 has reviewed the requested changes submitted by ABC Coke and has incorporated the appropriate changes.

Should you have questions regarding the inspection report, please do not hesitate to contact Ms. Nikki Radford of my staff at (404) 562-9099 or by electronic mail at radford.nicole@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Richard S. DuBose".

Richard S. DuBose
Chief
North Air Enforcement Section

Enclosure

cc: Mr. Jason Howanitz, P.E.
Air Pollution Control Engineer, Jefferson County Department of Health

PARTIAL COMPLIANCE EVALUATION

I. GENERAL INFORMATION

Facility Name: ABC Coke

Location: Birmingham (Jefferson County), Alabama

Date of Inspection: May 21, 2014

Type of Inspection: Partial Compliance Evaluation

AFS No.: 01-073-00355

EPA Investigator(s): Nicole Radford and Stephen Rieck

State/Local Investigator(s): Jason Howanitz, Jefferson County
Department of Health (JCDH)

Person(s) Contacted at Facility: Mark Poling, Manager of Engineering and
Environmental Compliance
Bill Osborn, Environmental Manager
Jay Cornelius, Assistant Manager
Engineering and Environmental Compliance

Report Prepared by: Nicole Radford

II. FACILITY INFORMATION

A. Facility Description/History

The facility currently has 2 batteries: Wilputte and Beckers. The Wilputte battery is 5 meters in height and has a volume of 2100 cubic feet. It is a gun block design battery. This battery has 78 ovens and was originally constructed in 1968. The Beckers battery is a 4 meter high Koppers battery. It was originally two separate batteries (#5 and #6) that were built in 1947 and 1953. Later these batteries were combined into one. There are 54 ovens in this battery. In an agreement with JCDH, the Becker's battery only pushes at night (for 16 hours starting at 2PM until 4 AM).

When the facility is running at full capacity, coking time is approximately 24 hours. Design specification for the facility is 1 inch of coke produced per hour. Both foundry and furnace coke are produced at this facility, although less than 25% of the coke produced is furnace coke. The coke is used by a wide variety of

companies including sugar beet farmers and foundries. ABC Coke is the largest supplier of foundry coke in the United States and Mexico.

The facility has two quench towers (North and South), and 3 baghouses. Wilputte has two baghouses rated at 285,000 cfm and Beckers has one baghouse rated at 165,000 cfm.

Other products produced at the facility include: coke oven gas, ammonium sulfate, light oil, tar and breeze.

B. Process Description

Coke Batteries:

Coal is transported to the facility by railcar or truck and then loaded into 10 silos. Eight silos are used for the different types of coal, one silo for breeze and one silo for recycled sludge from the chemical by-products process. Eight different types of bituminous coal are used at the facility, and all range from low to high volatility. The coal is from Kentucky, Virginia and West Virginia, and is 10,000 Btu/lb and low sulfur coal (sulfur content < 0.6%). A voluntary sprinkler system was installed at the facility for the coal piles to reduce PM_{2.5}. The coal is blended and then conveyed by belts onto the top of the battery where it is then placed in the Larry Car. After an oven is pushed the Larry Car distributes the coal into the oven, where it is coked. When the coke is finished coking it is pushed into a quench car. A cantilever hood is placed over the quench car for approximately 1 to 1.5 minutes in order to collect pushing emissions. The quench car is then transported to the quench tower. The quench tower sprays approximately 2000 gallons water onto the hot coke, cooling it. The finished coke product is then screened for the different sizes of product. There are several different sizes of coke produced: 6"x 9" to nut coke. After the coke is screened it is loaded into trucks or rail car and distributed to ABC Coke's customers.

Chemical By-Products plant:

During coking, Coke Oven Gas (COG) is produced by each oven. This gas is used to heat the battery, sent to the boilers, or sent to the flare. As coking occurs raw coke oven gas exits the ovens at a temperature of approximately 1400 – 1600F. It is routed to the Primary Coolers and sprayed with flushing liquor to cool it to 37 C. The COG is sent to the Exhauster where the gas is cooled to about 12 C, and cleaned. Four tar precipitators are run in parallel to remove acid mist. In the ammonia absorber the gas stream is sprayed with H₂SO₄. This process creates ammonium sulfate in the form of crystallized powder, which is later stored and sold as fertilizer. In the Tar Bottom Final Cooler the COG travels through tar, which removes the naphthalene from the COG. After the Final Cooler, the COG is sent to the wash oil scrubber, where the light oil is removed. The light oil is further processed by removing water. Approximately 4500 gallons/day of light oil

are produced. It is sold and removed by truck from the facility. Finally the clean COG is distributed to be used in the batteries, boilers, or directly to the flare. Twenty-five percent of the gas is used for battery underfire, approximately half is used for boiler cogeneration, and the rest is sent to the flare.

III. PRE-INSPECTION BRIEFING

On May 21, 2014, Nicole Radford and Steve Rieck of EPA held an opening conference at the facility at approximately 8:35 AM, where they showed the company their credentials. Jason Howanitz of JCDH, Bill Osborn, Jay Cornelius and Mark Poling of ABC Coke were in attendance for the opening conference, where the goals and a plan for the inspection were discussed. The purpose of the inspection was to look at both leak detection and repair (LDAR) and benzene waste operations (BWON) at the chemical by-products plant. The inspectors indicated that they would be using a Forward Looking Infrared Camera (FLIR), Toxic Vapor Analyzer (TVA) and digital camera during the inspection. The walk through began at 9:26 AM.

IV. REGULATORY REQUIREMENTS/PERMIT HISTORY

A. Regulatory Requirements

The ABC Coke Facility is subject to the following federal regulations:

- 40 CFR Part 70, Title V Operating Permits
- 40 C.F.R. 60 Subpart Y – NSPS for Coal Preparation Plants;
- 40 C.F.R. 60 Subpart Db – NSPS for Industrial-Commercial-Institutional Steam Generating Units;
- 40 C.F.R. 61 Subpart L – NESHAP for Benzene emissions from Coke by-Product Recovery Plants;
- 40 C.F.R. 61 Subpart V – NESHAP for Equipment Leaks;
- 40 C.F.R. 61 Subpart FF – NESHAP for Benzene Waste Operations;
- 40 C.F.R. 63 Subpart L – MACT for Coke Oven Battery;
- 40 C.F.R. 63 Subpart 5C – MACT for Coke Ovens: Pushing, Quenching, and Battery Stacks; and
- 40 C.F.R. 82 Subpart F – Class I and Class II Ozone Depleting Substances.

B. Permit History

In 2008, JCDH issued a renewal Title V permit to the ABC Coke facility. The permit expired on November 17, 2013. Subsequently, JCDH prepared and public noticed a proposed renewal Title V permit. At the time of EPA's May 21, 2014 inspection, the public comment period for the proposed renewal permit had

closed. Also, the 45-day period for EPA to review and comment on the proposed renewal permit had not yet commenced.

V. EMISSION SOURCE CHARACTERIZATION AND OBSERVATIONS

Drain Collection Sump (formerly the Naphthalene Sump):

The drain collection sump collects aqueous streams from various process vessels in the chemical by-products plant including the BTX decanter, the Purifier, the Wilputte decanter, and the Process Water decanter. After these streams are collected in the sump they are transferred via pipe to the Flushing Liquor decanters. At the time of the inspection, EPA observed a visual (liquid) leak on top of the sump. Liquid was leaking from a crack in the sealing material at a weld on the Gallagher Pump. EPA also observed 2 separate hydrocarbon leaks with the FLIR camera: one coming off of a bolt that connects the Gallagher pump to the cover of the Drain Collection Sump and on a flange next to the Gallagher pump. The TVA was used to verify a leak of over 2100 ppm on the bolt. ABC Coke made efforts to correct the leaks by using sealing materials after the leak was discovered. ABC Coke advised EPA that the Drain Collection Sump is currently not in the LDAR monitoring program.

Condensate Platform:

Sample point 6J from the Section 114 Information Request Response (light oil platform condensate) originates from condensers on the light oil platform. These heat exchangers are tube in shell exchangers. All vessels on the light oil platform go into a common drain, and if there are any tube leaks within the system the heat exchange water goes into the Dirty Water Sump. EPA used the FLIR camera on equipment on the condensate platform, but did not detect any leaks. EPA did see two drains on top of the platform that go to the Dirty Water Sump.

Dirty Water Sump:

The Dirty Water Sump collects aqueous streams from storm water drains throughout the chemical by-products plant, east and west downcomer drip pots and the light oil platform condensate. After these streams are collected they are transferred to the Wilputte decanter. EPA noted several leaks on top of the Dirty Water Sump with the FLIR camera. The leaks were coming from underneath sealing material located on top of the cover and what appeared to be a weld/seam between the cover and a pump on the top of the sump. The TVA flamed out (readings of greater than 30,000 ppm) three times while taking readings on top of the Dirty Water Sump. ABC Coke advised EPA that the Dirty Water sump is currently not in the LDAR monitoring program, but that they conduct monthly visual inspections and leak checks.

Wilputte Decanter:

EPA did not observe any emissions with the FLIR camera. ABC Coke advised EPA that the Wilputte Decanter is currently not in the LDAR monitoring program.

East and West Tar Decanters:

The East and West Tar Decanters are used to separate flushing liquor, tar and tar sludge. Sludge separates to the bottom of the decanters and is then raked out into 2 separate containers (one for each decanter). It is later blended with coal and used in the coke ovens. The tar is routed to the west tar storage tank, where it is eventually used in the Tar Bottom Final Coolers to remove naphthalene from the COG stream, and then routed to the east storage tank for sales. The flushing liquor is routed to the flushing liquor circulation tank. EPA noted leaking on the vacuum side of the Pressure Vacuum Relief Valves (PVRVs) on top of both the East and West Flushing Tar Decanters. The TVA verified a leak of greater than 30,000 ppm (the TVA flamed out) for the PVRV on the east and west decanters. The East Decanter also had leaks coming out of the seams on the roof of the decanter, which also caused the TVA to flame out (a reading of greater than 30,000 PPM).

Flushing Liquor Circulation Tank (FLCT):

The FLCT receives flushing liquor from the two tar decanters, and sends the flushing liquor back to the collecting main to cool COG. Any excess flushing liquor is sent to the dirty liquor storage tank. Any tar that is collected in the FLCT is routed through the flushing liquor sump (drain pan) located adjacent to the FLCT and then to the primary cooler sump. The FLCT is a process vessel under 40 C.F.R. 61 Subpart L – NESHAP for Benzene emissions from Coke by-Product Recovery Plants, and is required to have a control system. ABC Coke has chosen to install a gas blanket system. At the time of the inspection, EPA did not observe any emissions with the FLIR camera.

Dirty Liquor Storage Tank:

The dirty liquor storage tank receives excess ammonia liquor from the flushing liquor circulation tank which is then routed to the ammonia stills and then to the waste water treatment plant. Currently, Dirty Liquor Storage Tank is controlled by a gas blanketing system.

VI. CLOSING CONFERENCE/EXIT INTERVIEW

At the end of the inspection EPA conducted a closing conference. In attendance were Jason Howanitz of JCDH, Mark Poling, Bill Osborn and Jay Cornelius of ABC Coke. EPA inspectors summarized what they saw at the facility and indicated that they would send ABC Coke a CD-R of all photographs and videos taken during the inspection.

Attachment 1: Records Review

- 1) Quarterly reports for 3rd - 4th quarter 2013, 1st quarter 2014 (emailed)
- 2) 2nd Semi-annual for 2013 (emailed)
- 3) 2013 Title V Certification (emailed)
- 4) Kaiser Engineers Inc., 1988 By-Product Plant Inspection (emailed)
- 5) 4056-D001C By-Products Plant drawing
- 6) K087 Exempt Letters for RCRA (emailed)
- 7) ABC Coke Response to Public Comments on Title V Permit Renewal

